

ANDERSON KILL & OLICK, P.C.  
A New York Professional Corporation  
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Telephone: 212-278-1000

Attorneys for Defendant Enterasys Networks, Inc.

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ROBERT COLUCCIO,  
Plaintiff,  
  
- against -  
  
ENTERASYS NETWORKS, INC.,  
  
Defendant.

Civil Action No. 07 CV 3722 (KMK)

**NOTICE OF MOTION FOR  
PRO HAC VICE ADMISSION**

PLEASE TAKE NOTICE that upon the accompanying Affidavit of Gail M. Eckstein, Defendant, Enterasys Networks, Inc., will move this Court before the Honorable Kenneth M. Karas, at the United States Courthouse, New York, New York, at a time to be determined by the Court, for an order pursuant to Local Civil Rule 1.3(c) of the Rules of the United States District Courts for the Southern and Eastern Districts of New York admitting Pro Hac Vice Jonathan R. Sigel in the above-captioned matter.

Dated: July 12, 2007

ANDERSON KILL & OLICK, P.C.

By:

Gail Eckstein

Gail M. Eckstein (GE 7734)

1251 Avenue of the Americas  
New York, NY 10020  
Telephone: 212-278-1000

Attorneys for Defendant  
Enterasys Networks, Inc.

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

<p><b>ROBERT COLUCCIO,</b></p> <p><b>Plaintiff,</b></p> <p><b>- against -</b></p> <p><b>ENTERASYS NETWORKS, INC.,</b></p> <p><b>Defendant.</b></p>
--

Civil Action No. 07 CV 3722 ( )

**AFFIDAVIT IN SUPPORT OF**  
**PRO HAC VICE ADMISSION**

STATE OF NEW YORK :  
 : ss.  
COUNTY OF NEW YORK :

GAIL M. ECKSTEIN, being duly sworn, deposes and says:

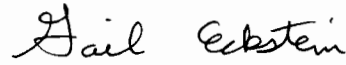
1. I am a member of the Bar of the State of New York and of this Court and am an attorney at the law firm Anderson Kill & Olick, P.C., counsel for Defendant Enterasys Networks, Inc. ("Enterasys") in this action.

2. I make this affidavit in support of Enterasys' motion, pursuant to Local Civil Rule 1.3(c) of the Rules of the United States District Courts for the Southern and Eastern Districts of New York, for an order admitting Jonathan R. Sigel to practice before this Court as counsel for Enterasys for all purposes in this action only.

3. Jonathan R. Sigel is a partner in the law firm of Bowditch & Dewey, LLP, 311 Main Street, Worcester, MA 01615-0156. Mr. Sigel is a member in good standing of the bar of the State of Massachusetts. Attached hereto as Exhibit "A" is a certificate of good standing for Mr. Sigel from the Commonwealth of Massachusetts. I have been advised that there are no pending disciplinary proceedings against Mr. Sigel in any state or federal court.

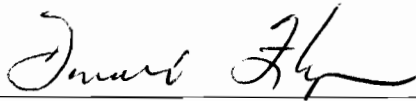
4. It is the desire of Enterasys to have Mr. Sigel represent him in this action in conjunction with this firm as he has been their primary counsel in this matter.

WHEREFORE, it is respectfully requested that Jonathan R. Sigel be admitted to practice before this Court as counsel for Defendant Enterasys Networks, Inc. in the above-captioned matter.



GAIL M. ECKSTEIN

Subscribed and sworn to before me  
this 12<sup>th</sup> day of July, 2007.



NOTARY PUBLIC

**DONALD FLYNN**  
**NOTARY PUBLIC, State of New York**  
**No. 01FL046358**  
**Qualified in Nassau County**  
**Certificate Filed in New York County**  
**Commission Expires July 10, 2011**

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Attorneys for Defendant Enterasys Networks, Inc.

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ROBERT COLUCCIO,  Plaintiff,  - against -  ENTERASYS NETWORKS, INC.,  Defendant.
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**Civil Action No. 07 CV 3722**

**PROPOSED ORDER FOR  
PRO HAC VICE ADMISSION**

IT IS HEREBY ORDERED THAT upon the Notice of Motion, dated July 12, 2007, the Affidavit of Gail M. Eckstein dated July 12, 2007, and the exhibit thereto, Jonathan R. Sigel of the law firm Bowditch & Dewey LLP, 311 Main Street, Worcester, MA 01615-0156 is admitted *pro hac vice* in the above-captioned matter to represent defendant Enterasys Networks, Inc. before this Court.

Dated: July \_\_, 2007

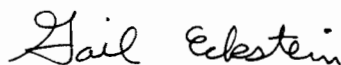
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Kenneth M. Karas  
United States District Judge

**CERTIFICATE OF SERVICE**

I, Gail Eckstein, hereby certify that I have on this 12th day of July 2007 served the foregoing by mailing copies thereof, postage prepaid, to the following:

Paul Andrew Marber, Esq.  
Joseph S. Rosato, Esq.  
The Cochran Firm  
233 Broadway, 5<sup>th</sup> Floor  
New York, NY 10279



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Gail Eckstein

## COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

BE IT REMEMBERED, that at the Supreme Judicial Court holden at Boston within and for said County of Suffolk, on the **seventeenth** day of **December** A.D. **1991**, said Court being the highest Court of Record in said Commonwealth:

Jonathan R. Sigel

being found duly qualified in that behalf, and having taken and subscribed the oaths required by law, was admitted to practice as an Attorney, and, by virtue thereof, as a Counsellor at Law, in any of the Courts of the said Commonwealth: that said Attorney is at present a member of the Bar, and is in good standing according to the records of this Court\*.

In testimony whereof, I have hereunto set my hand and affixed the seal of said Court, this **twenty-ninth** day of **June** in the year of our Lord **two thousand and seven**.



  
MAURA S. DOYLE, Clerk

\* Records of private discipline, if any, such as a private reprimand imposed by the Board of Bar Overseers or by any court, are not covered by this certification.